

**ROBINSON BROG LEINWAND GREENE
GENOVESE & GLUCK P.C.**
875 Third Avenue
New York, New York 10022
Fred B. Ringel
*Proposed Attorneys for the Debtor and Debtor in
Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

**WB BRIDGE HOTEL LLC and
159 BROADWAY MEMBER LLC,**

Debtors.

Chapter 11

Case No.: 20-23288-rdd and
20-23289-rdd
(Jointly Administered)

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DECLARATION OF ISAAC HAGER

Isaac Hager, hereby declares the following to be true under penalty of perjury:

1. I am the managing member of Cornell Realty Holdings LLC (“Cornell”).
2. Cornell gave **Robinson Brog Leinwand Greene Genovese & Gluck P.C.** (“Robinson Brog”), one payment of \$10,000, on behalf of WB Bridge Hotel LLC and 159 Broadway Member LLC (together, the “Debtors”), in connection with Robinson Brog’s representation of the Debtors in their chapter 11 cases.
3. This declaration is submitted in support of the Debtors’ Application for Authorization to Retain Counsel (the “Retention Application”). Pursuant to the Retention Application, the Debtors seeks to retain Robinson Brog to represent it as its bankruptcy counsel.
4. Robinson Brog advised me, and I understand that Robinson Brog will act only as counsel to the Debtors during the bankruptcy case. Robinson Brog further advised that if any

issues affecting Cornell or the Debtors arise during the pendency of these cases, Cornell will be required to retain independent legal counsel. Cornell is aware that Robinson Brog has a fiduciary duty to the Debtors and not to Cornell. To the extent that Cornell may require any advice or representation regarding the Debtors' bankruptcy cases, Cornell shall retain separate counsel.

5. Additionally, Cornell does not owe any money nor does Cornell own or control any entity that owes money to the Debtors. However, Cornell is scheduled as an unsecured creditor of the Debtor in the amount of \$4,253,483.47. No third party has guaranteed the Debtors' liability to Cornell. Finally, Cornell does not own or control any entity that intends to bid on any of the Debtors' assets and/or provide financing to the Debtors.

I declare under penalty of perjury under the laws of the United States, pursuant to 28 U.S.C. §1746, that the foregoing is true and correct.

Cornell Realty Holdings LLC

By: /s/ Isaac Hager
Isaac Hager
Managing Member